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June 18, 2018

BY ECF

Hon. Andrew L. Carter, Jr
United States District Judge
Southern District of New York
500 Pearl St., Room 1950
New York, NY 10007

**RE. *Dobbs, et al. v. Metropolitan Transit Authority, et al.*,
17cv8199 (ALC)(KNE)**

Dear Judge Carter, Jr:

I am an attorney from the Law Office of James E. Bahamonde, PC and hereby submit this joint status letter.

On May 3, 2018, Plaintiffs and Defendants MTA and Transit Authority appeared at a pre-motion conference before Your Honor. At that time, parties said we would try to resolve the case and avert motion practice. However, parties have been unable to reach to a resolution.

Consequently, Defendants respectfully seek permission to file a motion to dismiss. As a result, parties propose the following briefing schedule:

Notice of Motion and supporting papers	August 10, 2018
Papers in Opposition	September 20, 2018
Reply, if any	October 1, 2018

Thank you for your time and consideration.

**Law Office of
James E. Bahamonde, PC**

June 18, 2018

Respectfully yours,

/s/ James E. Bahamonde

James E. Bahamonde, Esq.

cc: (by ECF)
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